

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Kenneth E. Onyechi

*(In the space above enter the full name(s) of the plaintiff(s).)*

- against -

## Port Authority of New York and New Jersey

**COMPLAINT**

Jury Trial:  Yes  No

(check one)

*(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)*

**I. Parties in this complaint:**

A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>Kenneth Onyechi</u>
	Street Address	<u>N/A</u>
	County, City	<u> </u>
	State & Zip Code	<u> </u>
	Telephone Number	<u>202-847-9832</u>

B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name The Port Authority of New York and New Jersey

Street Address 4 World Trade Center (150 Greenwich Street, 24th Floor – Claims Dept.)

County, City New York

State & Zip Code New York 10007

Defendant No. 2

Name \_\_\_\_\_

Street Address \_\_\_\_\_

County, City \_\_\_\_\_

State & Zip Code \_\_\_\_\_

Defendant No. 3

Name \_\_\_\_\_

Street Address \_\_\_\_\_

County, City \_\_\_\_\_

State & Zip Code \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_

Street Address \_\_\_\_\_

County, City \_\_\_\_\_

State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

A. What is the basis for federal court jurisdiction? (check all that apply)

Federal Questions

Diversity of Citizenship

U.S. Government Plaintiff

U.S. Government Defendant

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? \_\_\_\_\_

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship \_\_\_\_\_

Defendant(s) state(s) of citizenship \_\_\_\_\_

**III. Statement of Claim:**

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Hoboken, New Jersey

B. What date and approximate time did the events giving rise to your claim(s) occur? May 24, 2020  
at approximately 3:45am

C. Facts: I was subject to battery and retaliation, and also targeted by a group of Port Authority police officers. I also experienced police negligence and police station intimidation following the incident.

Please read the incident report and notice of claim attached to the e-mail sent with this Pro se application to get a fuller context.

The first Port Authority police officer who approached me was an officer who I had made prior complaints to a police supervisor about. He accused me of riding the train all night. Another officer grabbed me by my shirt and pushed me off the train for not wearing a mask. The same officer moments later grabbed my left arm from the back twisting it and then twisted my left hand nearly at the same time. Later on he aggressively walked towards me as if he were going to assault me again.

No one else was involved.

A Port Authority train conductor saw what happened.

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

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**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. I have sustained psychological injuries as a result of the events alleged above. I have been diagnosed with PTSD and a depressive disorder.

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**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I would like the Court to extend the statute of limitations for me to bring litigation against the Port Authority of New York and New Jersey due to ongoing complications in me retaining legal representation. I would also like for the Court to assign me counsel.

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The amount of monetary compensation I am seeking is negotiable.

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**I declare under penalty of perjury that the foregoing is true and correct.**

Signed this 17 day of May, 2021.

Signature of Plaintiff Kenneth Onyechi  
Mailing Address N/A

Telephone Number 202-847-9832  
Fax Number (*if you have one*) \_\_\_\_\_  
E-mail Address onyechik@outlook.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: *Kenneth Onyechi*